

MEMO ENDORSED

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March 21, 2023

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
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Re: *Bishop v. Yorkbridge Wealth Partners, LLC*,
Case No.: 1:22-cv-10009

Dear Judge Caproni,

The undersigned represents Cedric Bishop, on behalf of himself and all other persons similarly situated (“Plaintiff”) in the above referenced matter against Defendant, Yorkbridge Wealth Partners, LLC (“Defendant”). The undersigned respectfully requests that the Initial Conference scheduled for March 31, 2023, at 10:00 AM (Dkt. 6) be adjourned for 60 days because Counsel for Defendant has not yet answered or appeared in this action. Notwithstanding Your Honor’s Order on March 20, 2023 (Dkt. 15), the undersigned has been continually attempting to contact Defendant’s Counsel via-email and telephone and therefore if the conference were to take place, we would not be able to prepare the Joint Status Letter and Case Management Plan without the Defendant’s input. If the Initial Conference is to take place, the undersigned respectfully requests that Your Honor grant the reasonable accommodation of allowing the Conference to be held telephonically due to my disability. In lieu of exhausting all other remedies due to the Defendant’s failure to respond, we also respectfully request that if Your Honor denies the above, that the Plaintiff be allowed to file for a Default Judgment in 30 days if the Defendant has still not appeared. This is the Plaintiff’s first request for an extension.

Respectfully submitted,

GOTTLIEB & ASSOCIATES
/s/Jeffrey M. Gottlieb, Esq.
Jeffrey M. Gottlieb, Esq.

Application DENIED without prejudice. The parties' joint letter remains due **March 23, 2023**. If Defendant remains unresponsive for purposes of preparing the parties' joint submission, then Plaintiff must file the letter on behalf of Plaintiff only and include a description of the efforts Plaintiff has made to contact Defendant's counsel.

SO ORDERED.



Date: 3/22/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE